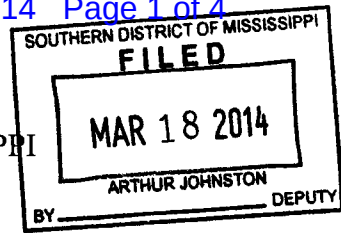


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

CRIMINAL NO. *3:14cr69CWR-FKB*

v.

WILLIAM MARSHALL WOLFE

18 U.S.C. §152(7)

18 U.S.C. §157(1)

The Grand Jury charges:

At all times relevant to this indictment:

1. Defendant **WILLIAM MARSHALL WOLFE**, and others, formed a Mississippi limited liability company by the name of MTW Investment Financing, LLC in February of 2004, which operated as a real estate investment enterprise in Pearl, Mississippi.
2. Defendant **WILLIAM MARSHALL WOLFE**, was affiliated with several other Mississippi limited liability companies (LLCs) as a managing member, officer or agent, by the names of Steadivest, LLC; Steadivest Capital, LLC aka Tactical Financial Solutions, LLC and Investlinc/TFS Income Fund, LLC; Steadivest Development, LLC; and others, which were formed between October and December of 2007, and operated as real estate investment enterprises or for development, financing, management and rehabilitation of real estate.
3. Defendant **WILLIAM MARSHALL WOLFE** sought investors into his various real estate ventures in the form of promissory notes and/or membership interests for the purpose of providing short term bridge financing for the rehabilitation of real estate properties.

COUNT 1

4. Beginning on or about January 2008, and continuing through March 2009, in the Northern Division of the Southern District of Mississippi, Defendant **WILLIAM MARSHALL WOLFE**, aided and abetted by others known and unknown to the Grand Jury, devised and intended to devise a scheme and artifice to defraud, and, for obtaining money and property by

means of false and fraudulent pretenses, representations, and promises, from investors under the guise of real estate investment rehabilitation.

5. It was part of the scheme and artifice to defraud that:

(a) Defendant **WILLIAM MARSHALL WOLFE** would solicit money from investors on the premise that their monies would be invested in companies providing short term bridge financing to borrowers for the purpose of rehabilitating real estate properties. **WILLIAM MARSHALL WOLFE**, through both oral and written representations, provided investors false and misleading information about the financial stability of the companies in which he was seeking investments. **WILLIAM MARSHALL WOLFE** provided information that the companies would provide the investors a high return on their investments, principal due upon demand on the promissory notes. **WILLIAM MARSHALL WOLFE** represented to investors that his companies had a positive cash flow and all loans and/or investments would be protected by real estate. **WILLIAM MARSHALL WOLFE** made false oral and written representations regarding the true financial condition of the companies in order to lure investors. Although **WILLIAM MARSHALL WOLFE** had obtained millions of dollars in investments/promissory notes in his various entities, **WILLIAM MARSHALL WOLFE** drained the companies of millions of dollars within a short period of time. **WILLIAM MARSHALL WOLFE**, unable to meet the daily operating obligations of the existing companies and pay interest payments to the investors, continually sought and obtained new investor funding, in order to meet the obligations of existing companies.

(b) On or about March 23, 2009, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **WILLIAM MARSHALL WOLFE**, having devised and intending to devise a scheme and artifice to defraud as set out above transferred title to real property from Steadivest, LLC, or its subsidiaries, to Investlinc/TFS Fund, LLC in order to deceive investors and preserve and keep proceeds from creditors, and for the purpose of

executing the scheme, filed and caused to be filed a petition under Title 11 of the United States Code, to wit, a Chapter 11 bankruptcy petition in the case entitled *In re Steadivest LLC., Case No.09-01013, in the United States Bankruptcy Court for the Southern District of Mississippi, Jackson Division.*

All in violation of Section 157(1), Title 18, United States Code.

COUNT 2

All allegations contained in Count 1 of this Indictment are hereby re-alleged in full.

6. On March 23, 2009, **WILLIAM MARSHALL WOLFE**, in Hinds County in the Northern Division of the Southern District of Mississippi, filed a petition under Title 11 of the United States Code, to wit, a Chapter 11 bankruptcy petition in the case entitled *In re Steadivest LLC., Case No.09-01013, in the United States Bankruptcy Court for the Southern District of Mississippi, Jackson Division.* In contemplation of filing the bankruptcy petition and with the intent to defeat the provisions of Title 11, on or about March 5, 2009, defendant **WILLIAM MARSHALL WOLFE**, fraudulently transferred real property held by Steadivest, LLC, or its subsidiaries, to Investlinc/TFS Fund, LLC.

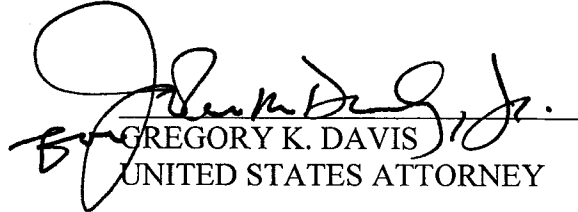
All in violation of Section 152(7), Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of

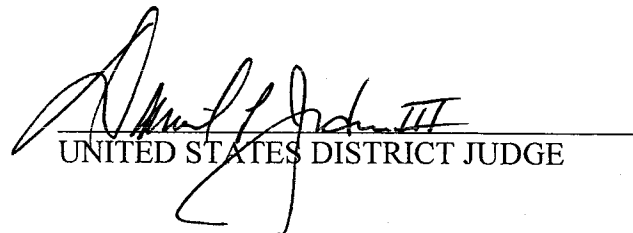
the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
UNITED STATES ATTORNEY

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 18 day of March, 2014.


UNITED STATES DISTRICT JUDGE